

**LAW OFFICE OF ABEL L. PIERRE**  
**ATTORNEY-AT-LAW, P.C.**

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July 26, 2023

Via ECF

Hon. Lorna G. Schofield, USDJ  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Application GRANTED in part. Plaintiff shall file any amended complaint adding defendants by **August 11, 2023**. Plaintiff shall file proof of service on the docket by **August 18, 2023**. The initial pretrial conference scheduled for August 2, 2023, is adjourned to **October 4, 2023, at 4:00 P.M.** At that time, the parties shall call 888-363-4749 and use the access code 558-3333. The deadline for the parties to file the joint letter and proposed civil case management plan and scheduling order is extended to **September 27, 2023, at 12:00 P.M.** If Defendant does not appear by September 27, 2023, Plaintiff shall move for default judgment in accordance with Individual Rule III.C.7 by **October 11, 2023**.

Dated: July 27, 2023  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**Re: Case No.: 1:23-cv-04569-LGS**  
**Read v. Atlantic Recovery Solutions LLC**  
**Southern District of New York**

Dear Hon. Schofield,

This office represents the Plaintiff Mr. Sean Read in the above-referenced matter. Please allow this letter to serve as the Plaintiff's application for an adjournment of the initial conference currently scheduled for August 2, 2023 and in response to this Court's July 21, 2023 Order.

Please be advised that Counsel for Plaintiff has been in contact with representatives of Defendant. We provided Defendant with the Court's order and a proposed initial joint letter and case management plan for Defendant's review and edits. However, despite our best efforts, the Defendant has not responded to our repeated attempts for its input to the initial joint letter and case management plan. Defendant's representatives assured us that they would respond, however, they have not.

Consequently, Plaintiff requests that the initial conference scheduled for August 2, 2023, be adjourned to October 2, 2023. Additionally, Plaintiff requests that his deadline to submit his motion for default judgment be extended to October 2, 2023.

Plaintiff requests this enlargement of the schedule as Plaintiff contemplates filing an amended complaint to add additional Defendants. The adjournment is not sought for reasons of delay or other improper purpose.

This is not a frivolous request, and this enlargement will have no impact on other deadlines in the case, as there are no other deadlines, and the Defendant has not yet made an appearance in this action.

We thank the Court for its courtesy in this matter.

Respectfully Submitted,



Abel L. Pierre, Esq.